



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

June 25, 2015

Re: Dovetail Energy, LLC  
Class B Biosolids Site Authorization  
NPDES  
Greene County  
1IN00305\*AD

Mr. Bruce Bailey  
Vice President of Technical Affairs  
quasar energy group  
5575 Granger Road, Suite 320  
Independence, OH 44131

Dear Mr. Bailey:

Ohio EPA received a request on May 26, 2015 from quasar energy group to include the following sites as part of the Dovetail Energy, LLC biosolids management program:

<u>Field ID</u>	<u>Ohio EPA #</u>	<u>County</u>	<u>Township</u>
GRQ-05-01	29-00429	Greene	Bath
GRQ-05-05	29-00430	Greene	Bath
GRQ-05-08	29-00431	Greene	Bath
GRQ-06-01	29-00432	Greene	Bath
GRQ-06-02	29-00433	Greene	Bath

These sites are owned by **Exemption 6** and operated by Pitstick Pork Farms, Inc. Ohio EPA Site 29-00429 is located northwest of the intersection of Armstrong Road and West Enon Road. The remaining sites are located northwest of Pitstick Pork Farms.

Ohio EPA has reviewed these sites and noted the conditions listed below. The review included consideration of soil and landscape characteristics, isolation distances from residences, geology and ground water conditions, and the proximity to waterways and wells.

- The review indicated a possible depth to bedrock of 20-40 inches on portions of these sites. Ohio Administrative Code (OAC) 3745-40-08(C)(1) states that biosolids may not be beneficially used within an isolation distance of three feet to bedrock. Ohio EPA recommends that the portions of these sites classified as Milton silt loam be probed before beneficial use to determine the depth to bedrock. Records shall be maintained indicating where the depth to bedrock is less than three feet and biosolids shall not be applied in these areas.
- Dovetail Energy has indicated that these sites have the potential to be draglined. Dragline systems shall be managed in accordance with the Dovetail Energy Dragline Standard Operating Procedure submitted to Ohio EPA on June 19, 2015.
- **All biosolids beneficially used at these sites shall be injected beneath the surface of the ground or immediately incorporated into the soil.** Additional isolation distance to surface waters of the state may need to be provided to account for potential runoff and to ensure that

the required thirty-three feet isolation distance is maintained. Biosolids that remain on the surface shall be incorporated within six hours to minimize the potential for runoff.

These sites are authorized to be included as part of the Dovetail Energy, LLC biosolids program. This authorization is subject to conditions listed above and those contained in both the NPDES permit and Ohio Administrative Code (OAC) 3745-40. Conditions contained in the NPDES permit and OAC 3745-40 may differ. In such cases, the more restrictive conditions from either the NPDES permit or OAC 3745-40 shall govern. Highlights of these conditions are as follows:

1. Biosolids shall not be applied in buffer zones.
2. In accordance with federal/state rules, biosolids may not be applied within 33 feet of surface waters of the state.
3. Biosolids application shall be timed to avoid periods of excessive wetness to help prevent runoff from a site.
4. Records for the application of biosolids on these sites shall be maintained in accordance with the requirements found in OAC 3745-40-09(C).

If you have any questions, please contact me at (614) 644-2150 or via email at [betsy.vanwormer@epa.ohio.gov](mailto:betsy.vanwormer@epa.ohio.gov).

Sincerely,



Betsy P. L. VanWormer, P.E.  
Environmental Engineer II  
Ohio EPA Division of Surface Water

Cc: Greene County Combined Health District  
Greene County Soil and Water Conservation District  
Bath Township Trustees

Exemption 6

Ec: Pitstick Pork Farms  
Ned Sarle, Ohio EPA, DSW/SWDO



Class B Biosolids  
Site Authorization

Dovetail Energy, LLC

Ohio EPA Site	Field ID
29-00429	GRQ-05-01
29-00430	GRQ-05-05
29-00431	GRQ-05-08
29-00432	GRQ-06-01
29-00433	GRQ-06-02

Greene County  
Bath Township

